

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH,
individually and as parent and legal
guardian of W.W., K.W., G.W., and L.W.,
minor children, and MATTHEW
WADSWORTH,

Plaintiffs,

vs.

WALMART INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

Case No. 2:23-CV-118-KHR

**ATTACHMENT B: DEFENDANTS' TRIAL EXHIBIT LIST WITH
PLAINTIFFS' OBJECTIONS**

WALMART INC. ("Walmart") and JETSON ELECTRIC BIKES, LLC ("Jetson"),
(collectively "Defendants"), by and through their attorneys, Crowley Fleck PLLP and McCoy
Leavitt Laskey LLC, for their trial exhibit list state as follows:

Exhibit No.	Description	File Name	Objections (Cite Fed.R.Evid)	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
A	Plasma Manual (Jetson 0001-0021)			A		
B	Plasma Warning Labels (Jetson 0022-0023)			A		
C	Consumer Testing Laboratories report (WM- Wadsworth 00015-00112)			A		
D	TestCoo Sample Plasma		Rule 403, Rule	B		

	Report		802			
E	Plasma UL 2272 Certificate of Compliance (Jetson 0574-0575)			A		
F	UL 2272 Plasma Test Record (Jetson 0322-0332)			A		
G	Battery Cell UL 2580 report (Jetson 0311-0321)			A		
H	First Floor Diagram from Gorbett Report			A		
I	Photo of melted smoking shed (M. Wadsworth Dep. Ex. 29)		Rule 403 (Also objecting based upon terminology of what's depicted in photo, which is subject of Plaintiffs' Motion in Limine)	B		
J	Photo of bedroom window and smoking shed area (Pasborg Dep. 4)			A		
K	Photo of bedroom window and smoking shed area (Sheaman Dep. 19)			A		
L	Photo of camper (M. Wadsworth Dep. Ex. 35)			A		
M	Photo of garage doors (Pasborg Dep. Ex. 5)			A		
N	Property aerial photo (Pasborg Dep. Ex. 3)			A		
O	Photo of electrical panel (Sheaman Dep. Ex. 21)			A		
P	Matterport screen shots (Robinson Dep. Ex. 14) and other applicable screen shots from Matterport			A		
Q	Matterport Diagram			A		
R	CT scan screen shots including: King Dep. Exs. 76, 77, and 80, screen shots from Sudler expert report and other applicable screen shots			A		
S	X-rays of hoverboard and			A		

	components including King Dep. Ex. 78 and other x-ray images of hoverboard					
T	Hoverboard photos including King Dep. Ex. 79, photos from Sudler expert report and other applicable photos of the subject hoverboard			A		
U	Melting Temperature of Common Materials Table (Sudler Report Figure 22)		Rule 403, Rule 802	B		
V	Closed loop electrical system for hoverboard diagram (Sudler Report Figure 20)		Rule 403, Rule 802	B		
W	IEC Internal short circuit test for a cylindrical cell photos (Sudler Report Figure 17)		Rule 403, Rule 802	B		
X	ISC Implantation – Active to Active (Sudler Report Figure 26)		Rule 403, Rule 802	B		
Y	Foil to Foil ISC Activation (Sudler Report Figure 27)		Rule 403, Rule 802	B		
Z	IECEE Certificate for battery cells (Sudler Report Figure 19)		Rule 403, Rule 802	B		
AA	IEC Internal Short Circuit Test (Sudler Report Figure 17)		Rule 403, Rule 802	B		
BB	Photos of exemplar hoverboard, battery pack and component parts from King expert file			A		
CC	Sudler photos from Oct. 31, 2023 joint evidence exam		Possibly cumulative - Rule 403.	B		
DD	Sudler photos from Feb. 29, 2024 joint hoverboard exam		Possibly cumulative - Rule 403.	B		
EE	Strandjord arc damage photos from site inspection		Possibly cumulative - Rule 403.	B		
FF	Strandjord arc damage		Possibly	B		

	photos from Oct. 31, 2023 joint evidence exam		cumulative - Rule 403.			
GG	Strandjord exterior house photos		Possibly cumulative - Rule 403.	B		
HH	Strandjord electrical panel photos		Possibly cumulative - Rule 403.	B		
II	Strandjord bedroom 4 photos		Possibly cumulative - Rule 403.	B		
JJ	Strandjord electrical photos from Oct. 31, 2023 joint evidence exam		Possibly cumulative - Rule 403.	B		
KK	Strandjord electrical diagram		Rule 403	B		
LL	Photo of Wadsworth house from 2018 MLS listing		Rule 401, Rule 403	B		
MM	Gorbett timeline		Rule 403	B		
NN	Gorbett shed test burn photos and/or video		Rule 401, Rule 403, Rule 802	B		
OO	Gorbett thermocouple tree at bedroom doorway graphs (Gorbett Report Figures 18 and 22)		Rule 802	B		
PP	Gorbett stills and/or video from computer fire model simulations		Rule 802	B		
QQ	FDS User's Guide		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B		
RR	FDS Verification Guide		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B		
SS	FDS Validation Guide		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B		
TT	Filas bedroom 4 site photos		Possibly cumulative - Rule	B		

			403.			
UU	Filas exterior house photos		Possibly cumulative - Rule 403.	B		
VV	Filas kitchen and hallway photos		Possibly cumulative - Rule 403.	B		
WW	Filas shed remains/debris photos		Possibly cumulative - Rule 403.	B		
XX	Filas basement photos		Possibly cumulative - Rule 403.	B		
YY	Filas refrigerator photos on		Possibly cumulative - Rule 403.	B		
ZZ	Applicable portions of UL 2580		Rule 106, Plaintiffs reserve the right to raise objections following review of the proposed exhibit	Reserve A, B, C		
AAA	Applicable portions of UL 2272		Rule 106, Plaintiffs reserve the right to raise objections following review of the proposed exhibit	Reserve A, B, C		
BBB	Applicable portions of NFPA 921		Rule 106, Plaintiffs reserve the right to raise objections following review of the proposed exhibit	Reserve A, B, C		
CCC	Applicable portions of NFPA 1033		Rule 106, Plaintiffs reserve the right to raise objections following review of the proposed exhibit	Reserve A, B, C		
DDD	Applicable portions of the The Ignition Handbook by		Rule 401, Rule 403,	B		

	Vytenis Babrauskus		Rule 602, Rule 802, Rule 901.			
EEE	Applicable portions of Smoldering Fires book by Vytenis Babrauskus		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B		
FFF	Portions of Ashley Merrell body camera video		Rule 106	B		
GGG	Portions and/or still photos from body camera video that show fire at time first responders arrived		Rule 106	B		
HHH	Portions of M. Wadsworth recorded interview with Detective Sheaman		Rule 106, Rule 403, Rule 802	B		
III	Portions of Wadsworth children interview with Detective Sheaman		Rule 106, Rule 403, Rule 802	B		
JJJ	Poly Outdoor Storage Drum (“Smoking Shed”) product information		Plaintiffs reserve the right to raise objections following review of the proposed exhibit	Reserved A, B, C		
KKK	The Science Behind the Development and Performance of Reduced Ignition Propensity Cigarettes article by Richard Baker, Steven Coburn, Chuan Liu and Kevin McAdam		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901	B, C		
LLL	Activities of Daily Living Questionnaire (Snyder Dep Ex. 67)			A		
MMM	Applicable portions of Dollar Value of a Day Tables 223, 224, 225		Rule 106	B		
NNN	OEWS State Occupational Employment and Wage Estimates		Rule 401, Rule 403	B		
OOO	Rowsey Schedule 1-11D (Rowsey Dep. Ex. 111)		Rule 403, Rule 802	B		

PPP	Life Care Plan Summary pg. 70-71 (Johnson Dep. Ex. 5)		Rule 403, Rule 802	B		
QQQ	Exemplar Plasma hoverboard		Reserve potential objection until counsel can review the proposed exemplar.	Reserve B		
RRR	House Rules (Nuttall Dep. Ex. 48)		Rule 401, Rule 403	B		
SSS	House Diagram (Schulz Dep. Ex. 100)			A		
TTT	Recs. K.W. Castle Rock Medical Center		Rule 401, Rule 403, Rule 802	B		
UUU	Recs. G.W. Castle Rock Medical Center		Rule 401, Rule 403, Rule 802	B		
VVV	Recs. L.W. Castle Rock Medical Center		Rule 401, Rule 403, Rule 802	B		
WWW	Recs. W.W. Castle Rock Medical Center			A		
XXX	Recs. L.W. Professional Counseling Services		Rule 401, Rule 403, Rule 802	B		
YYY	K.W. School Records		Rule 401, Rule 403, Rule 802	B		
ZZZ	G.W. School Records		Rule 401, Rule 403, Rule 802	B		
AAAA	L.W. School Records		Rule 401, Rule 403, Rule 802	B		
BBBB	W.W. School Records		Rule 401, Rule 403, Rule 802	B		
CCCC	Schulz invoices		Rule 403, Rule 802	B		
DDDD	King invoices		Rule 403, Rule 802	B		
EEEE	Snyder invoices		Rule 403, Rule 802	B		
FFFF	Demonstrative animations and/or aides		Plaintiffs reserve the right to raise objections following review of the proposed exhibit.	Reserved A, B, C		

Defendants hereby reserve the right to amend this list prior to trial. Defendants further

reserve the right to use any of the following:

1. Any and all discovery responses;
2. Any and all documents produced in discovery;
3. Any and all documents obtained through record subpoenas;
4. Any and all pleadings;
5. Any and all exhibits to be used for impeachment or rebuttal;
6. Any and all deposition transcripts or sworn testimony for any witness that has been provided in this case or in other matters;
7. Any and all demonstrative evidence necessary and/or pertaining to any expert witness opinions;
8. Any and all deposition exhibits;
9. Any and all exhibits identified by Plaintiffs; and
10. Any and all documents from any expert files.

Following review of Defendants' Exhibit List, Plaintiffs reserve the right to raise any additional objections following receipt of the physical exhibits.